

Hingtgen, Robert J

From: Gungle, Ashley
Sent: Monday, November 17, 2014 3:48 PM
To: Patrick BROWN (Patrick.BROWN@soitec.com); Asha Bleier (ableier@dudek.com)
Cc: Fogg, Mindy
Subject: Soitec- EIR Comments
Attachments: Comments on Draft EIR and Responses to Comments.pdf

Patrick and Asha,

Attached are our latest comments on the EIR and Responses to Comments.

We will discuss these comments and next steps at tomorrow's meeting.

Thank you,

Ashley

Ashley Gungle, Land Use/ Environmental Planner
COUNTY OF SAN DIEGO | Planning & Development Services
5510 Overland Avenue | Suite 310 | San Diego | CA | 92123
T. 858.495.5375 | F. 858.694.3373 | MAIN 858.694.2960
PDS Website <http://www.sdcounty.ca.gov/pds/index.html>
PDS Mapping Service <http://gis.co.san-diego.ca.us/>

Comments on EIR.

1. Page AIS-9: The Additional Information Statement says that the addition of 160 energy storage units “would interrupt the continuity and visual pattern of repetitive CPV tracker rows.” Please confirm whether this interruption in the visual pattern results in an additional significant aesthetic impact, particularly when viewed from a “superior viewing location.” In the last sentence of the second paragraph, please also clarify that matching storage container colors will be *required* rather than recommended.

2. Page S.0-3: Please confirm the EIR is consistent regarding the distance of the underground gen-tie line that will be in the public right-of-way. The first full paragraph says it will be .5 mile, while the third full paragraph says it will be .6 mile. See page 1.0-26 for the same issue.

3. Page S.0-16: Please update MI-BI-PP-3 to reflect the changes made to the mitigation on page 2.3-196.

4. Page S.0-26: Please update M-BI-PP-8 to reflect the changes made to the mitigation on page 2.3-199.

5. Page S.0-66: Please add a conclusion to Table S-2 for Impacts CR-R-1, CR-LE-1, and CR-LW-1.

6. Page S.0-80: The first full paragraph says there will be a construction overlap for Tierra del Sol and Rugged under Alternative 4. Explain whether there will also be a construction overlap for Tierra del Sol and Rugged in Alternatives 1, 2, and 3.

7. Page S.0-81: The first sentence of the last paragraph says that Alternative 5 will have similar impacts compared to the project, but the paragraph then concludes that most project impacts will be reduced by this alternative. Please clarify. See the last paragraph on pages S.0-82 and S.0-83, and the first full paragraph on page S.0-85 for the same issue.

8. Page S.0-83: The last paragraph refers to reduced noise impacts from Alternative 7. Would this reduction in noise, which is connected to the elimination of the overhead portion of the Tierra del Sol gen-tie, also be realized for the other Los Robles alternatives (Alternative 5, Alternative 6, and Alternative 8)?

9. Page S.0-88: Parts of Table S-3 are not consistent with the text of Section S.5. For example, Table S-3 says that: impacts to noise are similar to the Project for Alternative 3; impacts to noise and biological resources are similar to the Project for

Alternative 4; impacts to cultural resources are similar to the Project for Alternative 5; and impacts to air quality are greater than the Project for Alternative 6. These conclusions are all inconsistent with the conclusions in Section S.5. See Table 4-1 and Table 4-2 in Chapter 4 for the same inconsistency issue.

10. Page 1.0-18: Can the discussion of decommissioning activities estimate what the typical term would be for a Power Purchasing Agreement?

11. Page 1.0-22: Do the “facility foundation pads” referenced in the first paragraph include the areas where the optional energy storage system units will be placed?

12. Page 1.0-24: In the last paragraph, clarify whether the overhead trunk lines for Tierra del Sol will be on or off-site.

13. Page 1.0-31: Please confirm whether Rugged will have the same overhead collection system as Tierra del Sol. If so, add a description of the system.

14. Page 1.0-37: The first paragraph appears to say that the EIR includes only one mitigation measure and one project design feature for aesthetics. Please clarify.

15. Page 1.0-55: LanEast and LanWest have significant unmitigated land use impacts related to inconsistencies with General Plan Policies COS-11.1 and COS-11.3. Please add a General Plan amendment to Table 1-11 for these two projects. See responses to comment I92-5 and I92-7 for the same issue. In addition, please correct footnote two in Table 1-11 to say San Diego County Superior Court. See Section 2.5 for this same correction.

16. Page 2.1-34: The second paragraph says that Key Views 6 and 7 are analyzed further in Section 2.1.3.3 of the EIR (light and glare). Please confirm this is the correct section reference. In addition, please explain why Key Views 10 and 12 are not analyzed in Section 2.1.3.1.

17. Page 2.1-48: Please explain why construction impacts are not analyzed for Tierra del Sol in Section 2.1.3.2. Same question for the aesthetics impact analysis for Rugged on page 2.1-55.

18. Page 2.1-51: Please add conclusions for impacts at Key Views 9 and 10.

19. Page 2.1-64: In the third paragraph, please clarify there are no residences located 370 feet or higher in elevation from the Project that are in *direct view* of the Project's solar equipment.

20. Page 2.1-65: In the last paragraph, correct the reference to MM-BIO-12. Also, why is this mitigation measure discussed for Rugged, but not Tierra del Sol?

21. Page 2.1-67: Please clarify why glare impacts are analyzed for recreationists for Rugged, but not Tierra del Sol, LanEast, or LanWest.

22. Page 2.1-82: In the last paragraph, add a conclusion related to the Project's cumulative impacts.

23. Page 2.2-11: The third paragraph says that the air quality analysis uses different methodologies to estimate construction and operational emissions for Rugged and Tierra del Sol. Please explain why the analysis uses different methodologies.

24. Page 2.2-12: The daily construction schedule listed in the second bullet point is not consistent with either the schedule used in the EIR's aesthetics analysis or information on pages 2.2-19 and 2.2-23. Also, please clarify how and why the EIR uses the SDAPCD thresholds listed in the last two paragraphs. Are these thresholds used in addition to the County's air quality guidelines for determining significance?

25. Page 2.2-14: Please clarify whether the analysis in Section 2.2.3.1 also needs to examine construction emissions.

26. Page 2.2-16: The second paragraph says that LanWest will generate fewer than *nine* trips per day, "which is less than the amount anticipated under the current designation." However, this paragraph also says that the General Plan designation for the property would allow *seven* trips per day. Please clarify.

27. Page 2.2-35: Explain the source of the significance thresholds used to analyze impacts to sensitive receptors.

28. Page 2.2-68: For M-AQ-LE-2 and M-AQ-LW-2, please add text requiring the Project proponent to implement reduction measures identified in the site specific air quality technical report. Please also indicate typical reduction measures that may be required by the report.

29. Page 2.2-70: Explain further why there is no other feasible mitigation to reduce impacts AQ-PP-1, AQ-PP-2, and AQ-CUM-1 to a less than significant level.

30. Page 2.2-71: In the first paragraph, explain how the air quality reduction measures identified in the technical report required by M-AQ-LE-2 and M-AQ-LW-2 will be effective in avoiding or reducing the Project's significant impacts.

31. Page 2.3-77: Please explain why focused surveys were conducted for LanWest but not LanEast.

32. Page 2.3-106: The description in the second paragraph of PDF-N-2 and PDF-N-5 is inconsistent with the description in Chapter 1.

33. Page 2.3-142: In the fifth paragraph, please describe where the EIR discusses measures designed to avoid oak woodland habitats for Rugged.

34. Page 2.3-148: The last paragraph says that LanEast will not use any on-site groundwater wells for any purpose. This is inconsistent with information in Sections 3.1.5.3.4 and 3.1.9.3.1. See the first paragraph on page 2.3-149 for the same issue.

35. Page 2.3-154: The first paragraph says that Rugged will not impact federally protected wetlands. This appears inconsistent with BI-R-21 on page 2.3-144. See the first paragraph on page 2.3-155 for the same issue.

36. Page 2.3-183: The third paragraph says that the Project will not result in substantial dust generation. Please confirm this is consistent with the air quality analysis for PM10 in Chapter 2.2.

37. Page 2.4-19: The first full paragraph says that P-37-031680 will be preserved in an avoidance area. Please explain how the Project will be required to preserve this area.

38. Page 2.4-26: In the third and fourth paragraphs, please confirm that the numbers listed for significant sites in the cumulative study area are consistent.

39. Page 2.5-28: In the first paragraph, clarify whether PDF-TR1, PDF-TR2, and PDF-TR-3 are required for the EIR to conclude that the Project will not have a significant land use impact. See throughout Section 2.5.3.1 for the same issue.

40. Page 2.5-36: The EIR cites to Zoning Ordinance Section 1350, which conditionally permits major impact services and utilities "when the public interest

supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community wide interest.” Please confirm that the Project conforms to this quoted language.

41. Page 2.5-39: The fourth paragraph indicates a range of setbacks for Rugged. It is unclear whether this range complies with the setback requirements for the underlying zones. Please clarify.

42. Page 2.5-48: Table 2.5-3 refers to a development agreement to provide proportional funding for fire protection services. Please confirm this is consistent with revised PDF-PS-1.

43. Page 2.5-54: Table 2.5-4 does not address whether LanEast and LanWest will impact RPO wetlands or slopes.

44. Page 2.6-13: Please explain why the significance guidelines the EIR uses to analyze operational noise do not address interior noise.

45. Page 2.6-35: Please make sure the daily construction schedule listed in the second paragraph is consistent with the schedule used in other sections of the EIR.

46. Page 2.6-48: PDF-N-4 says that construction activities for Rugged and the Tule Wind Energy project will be “coordinated.” Please explain further how this coordination will be required.

47. Page 3.1.4-25: Please explain whether PDF-HZ-1 relates to compliance with existing regulatory requirements. Same issue for PDF-HZ-2 on page 3.1.4-37.

48. Page 3.1.4-43: Explain the source of the second significance guideline used by the EIR to analyze hazards associated with interference of emergency responses. In the first paragraph of the analysis section, discuss whether Tierra del Sol meets the emergency response objectives identified in the Safety Element of the General Plan. See the analysis of the other three projects for the same issue.

49. Page 3.1.4-44: In the second paragraph, clarify whether the Tierra del Sol gen-tie structures will be placed on ridgelines. Also clarify whether the FAA no hazard determination for the Tierra del Sol gen-tie analyzed hazards to emergency response aircraft. See comment O10-81 for the same issue.

50. Page 3.1.4-49: The first paragraph notes additional project design features and mitigation measures for the Tule, ECO, and ESJ projects that are designed to reduce or avoid wildfire hazards. Please clarify whether the Project incorporates these same measures.

51. Page 3.1.5-36: The EIR says that Rugged does not propose any structures within the limits of the 100-year floodplain. This appears inconsistent with Page 3.1.5-11 where the EIR says that portions of the solar tracker field will be in the “calculated 100-year floodplain of Tule Creek.” Please clarify.

52. Page 3.1.5-56: The first paragraph says that “[p]erformance standards contained within both the Groundwater Ordinance and the County Guidelines require groundwater use to be less than significant.” Please verify this statement, and whether this indicates the County may not approve a project with significant unmitigated groundwater impacts.

53. Page 3.1.7-11: Please identify the duration of the annual funding requirement in PDF-PS-1. Also explain whether additional facilities will be needed to accommodate new paramedic staff required by this PDF.

54. Page 3.1.8-12: In the first paragraph, please explain further how the EIR concludes that construction traffic associated with Tierra del Sol would not be distributed on local and regional roads during the PM Peak Hour time frame (4 p.m. to 6 p.m.), when project construction may last until 7 p.m. See the third paragraph for the same issue for Rugged.

55. Page 3.1.8-18: The last paragraph says that “during the most intense phase of construction (site grading and clearing) the [construction] schedules [of Tierra del Sol and Rugged] would not overlap.” This appears inconsistent with text on page 3.1.8-28 that says “the most intense phases of construction for both solar farms would occur simultaneously.”

56. Page 3.1.8-31: In the next to last paragraph, explain *how* adequate sight distance will be required at all Project driveways and intersections.

57. Page 3.1.9-11: Please add a reference in this section to the EIR’s air quality and traffic sections for analysis of potential water transportation impacts from the Project.

58. Page 3.1.9-14: In the second paragraph, please clarify whether the production capacity (12.5 gpm) of on-site wells at LanEast and LanWest will accommodate the estimated construction water demand (31 acre feet).
59. Page 3.1.9-17: In the first paragraph of the Tierra del Sol analysis, change the reference from Section 3.1.9.1.2 to Section 3.1.9.1.1.
60. Page 4.0-55: Please explain why it is necessary for Alternative 8 to include 1,006 additional trackers on the Los Robles site.
61. Page 8.0-1: Please add a discussion of the Project's potential energy impacts pursuant to CEQA Section 21100(b)(3) and CEQA Guidelines Appendix F.
62. Page 9.0-2: Response to comment ALT1 says that the County screened alternative locations. Please specify the screened locations; pages 4.0-7 to 4.0-8 of the EIR do not identify the screened locations. Also update the page references to the EIR.
63. Page 9.0-5: Please re-phrase the first sentence of the response to clarify this is a summary of public comments received.
64. Page 9.0-28: Confirm that the EIR has analyzed potential traffic and air quality impacts from increased reliance on recycled water from Padre Dam Municipal Water District ("PDMWD").
65. Page 9.0-32: Re-order the response to start with a summary of the EIR's analysis and conclusions related to Project impacts on local roadways. Then the response should generally discuss maintenance of County roads, avoiding any commitment to a particular road surface treatment.

Comments on Draft Responses to Comments.

1. C1-4: Please address the comment about glare from misaligned solar panels.
2. C2-23: Refer the commenter to the EIR's analysis of alternatives that include an underground gen-tie component.
3. C2-38: Chapters 3.1.5 and 3.1.9 do not reference the Rough Acres Water Company ("RAWC") as a water source for the Project. Please clarify whether the Project uses RAWC as a water source. See Response C2-116 and I100-5 for the same issue.

4. C2-57: Please add a reference to the EIR's discussion of a distributed energy alternative.
5. C2-59: Delete the second paragraph of the response.
6. C2-133: Please provide responses to the comments attached to the comment letter.
7. F1-2: Note that the term of the MSCP Planning Agreement has been further extended. Please update the response. Please also delete the fourth paragraph of the response ("The East County MSCP Plan Area is the...").
8. I1-1: Can the response further rebut the comment by providing the specific distance between the Project and the commenter's property? See response to comment I4-2 for the same issue. Please also refer the commenter to other responses addressing health risk issues.
9. I2-2: The response refers to response I1-5 related to fires associated with transmission lines. However, I1-5 focuses on whether tall utility structures affect firefighting efforts. Please address the comment about fires from transmission lines.
10. I10-1: Please provide a response on potential flooding impacts at the Rugged site, and possible transborder groundwater impacts from Rugged. In addition, it is unclear why several of the draft responses have been deleted.
11. I13-1: Please address the comment about potential flooding at the Rugged site.
12. I19-4: Please address the comment about water quality impacts from Project run off.
13. I25-2: Either specify the location in the administrative record of the newly obtained "site specific wind data," or explain further why the number of wind days during construction was increased.
14. I31-6: Please respond to the comment about the County's Traffic Impact Fee program.

15. I32-6: Please provide a response to the anecdotal comment that the Project could require additional panel washing based on prevailing weather conditions in the area.

16. I32-7: Add a reference to response I21-1.

17. I32-13: Clarify whether the EIR studied water supply issues in the eastern slopes region of the Tecate Divide. If not, please explain why.

18. I32-21: Although issues related to the local tourism economy are not typically CEQA issues, the EIR did review potential aesthetic impacts to “recreationists.” Consider clarifying the response to add this information.

19. I34-6: Clarify that the EIR’s glare study analyzed potential impacts to private residences.

20. I37-2: Please address the Raftery/Hales article cited in the comment.

21. I38-2: Clarify whether the EIR analyzed potential impacts to coast live oak roots from construction in the right-of-way of the Tierra del Sol gen-tie line.

22. I38-3: Clarify whether the EIR analyzes groundwater impacts from Tierra del Sol to Ejido Jardines Del Rincon in Mexico. See public comment I40-3 for the same issue.

23. I38-9: Please address the comment about low frequency noise. See response I38-35 for the same issue.

24. I38-21: Address the “scenic” locations referenced in the comment.

25. I38-30: The responses in this segment repeatedly say that the comments do not “provide specific details regarding the addresses or locations” of various sites. Confirm whether these sites can nonetheless be located based on the general descriptions given in the comments, or explain further why these sites are unnecessary for the EIR’s analysis.

26. I38-34: Explain why Walker Canyon Ecological Preserve cannot be located.

27. I38-39: Explain whether it is reasonable and accurate to establish existing ambient traffic noise conditions based on traffic volume data, instead of on actual noise level measurements at a site.

28. I38-44: Please address the comment regarding the A72 zone in the McCain Valley.

29. I38-55: Address the comment about *fire* staffing impacts and special fire training and equipment

30. I38-56: Provide citations for the statements made in this response, particularly for the last sentence of the first paragraph (“Further, there is a commitment...”).

31. I38-63: Explain why the addition of a new heliport in the Boulevard area is not anticipated to change the FAA determination of No Hazard.

32. I38-69: Clarify whether the reports referenced in this comment were addressed by the Sheppard memorandum.

33. I38-71: It is unclear how the reference to common response WR-2 addresses this comment.

34. I38-73: Please explain further why it is reasonable for the EIR to “annualize” or amortize the Project’s construction water use over 20 years.

35. I40-7: Provide a citation for the statement that the relevant fire agencies have said the Project “would have minimal impact on firefighting.”

36. I42-3: Revise the second sentence of the response; it is not clear how these law enforcement issues are social or economic issues.

37. I55-1: Update the description of PDF-PS-1.

38. I55-2: The fire safety report referenced in the comment appears to apply primarily to rooftop solar installations, not large scale solar facilities like the Project. Clarify whether the report applies to the Project. If the report does apply, discuss whether the EIR’s analysis is consistent with the report.

39. I56-1: Correct the number of comment I56 (comment currently shown as I34).
40. I68: Please provide citations for the responses to this comment letter.
41. I83-5: Please provide a response to the comment about misaligned trackers. Is misalignment likely to occur at the Project site?
42. I83-11: Refer to the Project's proposed rezone to remove the "A" designator from part of the Tierra Del Sol property.
43. I89-4: Clarify that the Project will result in significant unmitigated impacts related to PM10 levels.
44. I89-11: Provide citations for the statements related to firefighting operations.
45. I89-13: PDF-PS-1 applies to emergency personnel. Clarify whether this includes firefighting personnel.
46. I89-16: Explain whether the EIR's fire protection analysis considers the issues raised by the commenter related to the Jacumba fire station.
47. I89-21: Provide a citation for the statement that the County has committed to provide full-time fire and emergency services in all of its fire stations. Also update the information related to funding by the Project of full-time firefighting positions.
48. I95-56: Please respond to the comment about potential eagle take.
49. I96-4: The response refers to "incorporation of the mitigations" related to fire safety impacts. Please clarify whether this should instead refer to project design features. Please make this change throughout the responses to comments.
50. I98-7: Address whether the soil conditions of the Rugged site require additional water use during construction.
51. I99-6: Clarify what the response means when it says wells did not *respond* to the 72-hour aquifer test.

52. I104-6: The comment refers to potential aesthetics impacts to Boulevard Estates. The response says that views of Rugged may be available to residents of the Boulevard Heights area. Clarify whether this is the same area.

53. O3-3: Please provide citations for the last sentence (“Contrary to the commenter’s assertion...”)

54. O4-3: Provide a citation for the statement that the Project will have “no appreciable impacts on surface waters in the Carrizo Gorge and Anza-Borrego Desert State Park.” Also revise the second to last sentence of the draft response (“Water use by any other project...”); water use by other nearby projects should be evaluated in the EIR’s cumulative analysis.

55. O7-6: Please address the commenter’s request for wildlife tracking studies.

56. O7-9: Address the comment about whether Well MW-0 is ideally located to monitor impacts to groundwater dependent habitat.

57. O7-11: The response says that groundwater pumping will cease and extended monitoring will be required if the initial monitoring data is “ambiguous” regarding the cause of stress to oak habitat. Please clarify where M-BI-PP-15 requires this.

58. O9-4: Please provide a response to this comment.

59. O10-4: Indicate whether there are written responses to the commenter’s October 10, 2013, letter containing scoping comments.

60. O10-6: The response says that the EIR is a “planning-level document.” Clarify that the EIR contains project level analysis for Tierra del Sol and Rugged. See response WR-1 for the same change.

61. O10-7: Please specifically address why the Imperial County alternative site suggested by the commenter is not feasible.

62. O10-11: Address footnote five of the comment.

63. O10-22: Address the comment about the EIR’s “myopic” focus on the groundwater significance guidelines.

64. O10-24: Confirm whether the EIR's analysis of groundwater impacts includes potential impacts to the Campo-Cottonwood Sole Source Aquifer.
65. O10-28: Add a response clarifying that PDMWD will provide *reclaimed* water for the Project.
66. O10-44: Address the comment about how the EIR determined the acreage of impacts to golden eagle foraging habitat
67. O10-46: In discussing whether a program EIR was appropriate for the Project, the response says that LanEast and LanWest are "logical parts in the chain of contemplated actions." Please clarify whether these two projects are still "contemplated" by the applicant.
68. O10-47: Please add a reference to PDF-BI-1.
69. O10-49: Explain what steps will occur if quino checkerspot butterfly is discovered during focused surveys prior to construction.
70. O10-57: Explain further how compliance with APLIC standards will effectively mitigate the Project's biologic impacts from bat and bird contact with transmission lines. Please also clarify whether cumulative projects will be required to comply with APLIC standards; the commenter says these standards are "guidelines."
71. O10-60: Clarify whether the EIR's cumulative analysis considers bird impacts from the Tule Wind project.
72. O10-62: Add a citation to the response about the "carrying capacity" of habitat.
73. O10-63: The response says that the EIR's cumulative noise analysis now includes the Tule Wind project. Clarify whether this revised cumulative analysis considers the combined Project and Tule Wind project noise impacts on the noise sensitive land uses referenced in the comment. Also clarify whether the addition of the Tule Wind project changes the conclusions of the EIR's cumulative noise analysis.
74. O10-71: Confirm that the Sheppard memorandum estimates the Project's EMF levels.

75. O10-77: The response addresses glare from solar trackers in horizontal stow mode. Clarify whether the Project's glare study also analyzed this type of glare, or whether the analysis in the response is new. Also substantiate the statement that windy stowage procedures will be "limited to the beginning and end of the day." Please also respond to footnote 47 of the comment.

76. O10-82: Explain further how firefighters will know how to de-energize the solar facilities and place CPV trackers into stow mode. Is this part of the training required under the Project's fire protection plans? Please also explain how firefighters will avoid shock when water is the "most likely" method to extinguish a fire at the Project site. Finally, please address the potential fire risk from battery storage.

77. O10-83: Provide a citation to the "available research and scientific principles" that makes tracker ignition unlikely. Also provide a citation for the statement that "the potential generation of toxic vapors is low."

78. O10-91: Explain why the County "does not believe there is substantial evidence to conclude that the manufacture of the CPV trackers or other [P]roject components would not occur if not for the Proposed Project.

79. O10-99: The response says that the "Calexico site already is slated for a solar project." Please provide more information about the Calexico solar project. For example, has this project been approved? Is Soitec the project applicant?

80. O10-124: The exhibits to comment O10 are not included. Please confirm these exhibits are in the administrative record and are addressed in the responses to comments.

81. O13-18: Please address the comment about the location of the mitigation site.

82. O15: Please confirm there are responses to the exhibits attached to the comment letter.

83. O21-4: Explain whether the noise analysis proposed by the commenter is applicable to the type of noise expected from the Project.

84. O21-9: Explain whether CNEL analysis requires consideration of noise tones and impulses.

85. O21-10: Explain whether the EIR analyzed traffic noise from the Project.
86. S3-10: Please address the comment about whether the EIR relies on compliance with the ECMSCP interim procedures to satisfy CEQA's cumulative analysis requirements.
87. S3-20: Confirm whether there is updated information related to inspection of overhead components of each solar farm site.
88. S3-22: The response says the County has determined that an alternative eliminating the Rugged site does not achieve Project objectives. Clarify where the EIR makes this determination, and the basis for this conclusion.
89. S3-30 and 31: The responses appear to focus on Option 2 of M-BI-PP-1. Explain whether Option 1 also addresses the commenter's concerns about the EIR's habitat based mitigation.
90. S3-47: Address the comment about application of APLIC standards to on-site distribution lines. Also delete the second sentence.
91. S3-53: Clarify whether golden eagle impact conclusions have changed for LanEast and LanWest based on response S3-3
92. S3-54: Address the commenter's suggestion that a connection exists between impacts to golden eagle foraging habitat and nesting success.
93. S3-56: Address the comment about "possibly outdated" surveys.

